

Monte J. White & Associates, P.C.  
1106 Brook Ave  
Wichita Falls, TX 76301  
(940)723-0099  
(940)723-0096 Fax

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

In Re:	§	
Michael Earl Russell	§	Case No. 19-70332-hdh-13
Brandy Michele Russell	§	Chapter 13
Debtor(s)	§	

DEBTOR(S) MOTION TO EXTEND AUTOMATIC STAY

Come Now Debtors, by counsel, and for this Motion and state as follows:

1. Debtor(s) filed for relief under Chapter 13 in the Northern District of Texas.  
This is a core proceeding.
2. Debtors were debtors in a prior case during the preceding year. Debtor(s) Chapter 13, Case No. 17-70284 was filed on September 14, 2017.
3. Debtor(s) seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor(s) prior case was dismissed because during the debtor's last case, they fell behind on their payments due to an increase on the monthly plan payment amount. Debtor's were unable to maintain monthly expenses while making their plan payment.
5. Debtors payment will decrease from \$2920 a month to \$2197 a month, making this plan more successful.
6. Debtor(s) is/are refiling to save their house.

WHEREFORE, Debtor(s) request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White  
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on November 20, 2019, on all parties on the mailing matrix:

/s/Monte J. White  
Attorney for Debtor(s)